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ATTORNEY FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

MICHAEL JAMES MASON,
Defendant.

CR-16-23-BU-DLC-02

**UNOPPOSED MOTION TO
CONTINUE CHANGE OF PLEA
HEARING**

Comes now Defendant, by and through counsel, and moves to
continue the change of plea hearing in this matter, currently set for April 12,
2017, at 2:00 p.m.

The basis for this request is Mr. Mason has a personal commitment of
the utmost importance on April 12, 2017, at 1:00 p.m., and he absolutely
cannot miss it. This personal commitment is a previously scheduled

treatment team meeting at Shodair Children's Hospital for Mr. Mason's minor son. This treatment meeting involves six of the minor child's providers including doctors, psychiatrists, therapists, and teachers. The purpose of this meeting is to plan for an overnight visit for the minor child at the family residence and the treatment team is requesting all family members who live in the residence attend. After the treatment team meeting, Mr. Mason and his family are hopeful the minor child will be allowed to have an overnight visit with his family that night.

Mr. Mason's child has serious mental health issues and has not been able to visit the family home since October. An overnight visit for the minor child would be a significant step toward reunifying the family to meet the end goal of returning the minor child to the residence full time.

Counsel for the United States has been contacted and does not oppose this motion.

The undersigned is available to be in Missoula on April 24, 2017, or April 25, 2017.

DATED this 12th day of April, 2017.

/s/ Ashley Harada

Ashley Harada
Attorney for Defendant

CERTIFICATE OF SERVICE - L.R. 5.2(b)

I hereby certify that on April 12, 2017, a copy of the foregoing document was served on the following persons by the following means:

 1-2 CM-ECF
 Hand Delivery
 Fax
 Mail
 E-Mail

1. Clerk, U.S. District Court
2. Joseph Thaggard
 Tara J. Elliott
 U.S. ATTORNEY'S OFFICE - MISSOULA
 PO Box 8329
 Missoula, MT 59807

/s/ Ashley Harada

Ashley Harada